

Before the Federal Communications Commission, Washington, DC 20554

PR Docket No. 93-305

Notice of Proposed Rulemaking
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Comment Date: March 7, 1994

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Comments in the matter of

FCC MAIL ROOM

Amendment of the Amateur Service Rules to implement a vanity
call sign system.

Prepared 1 Mar 1994 (Orig. and 9 copies)

Submitted by: Stuart E. Bonney, 802 Melrose Dr., Richardson, TX 75080

1. INTRODUCTION

The undersigned radio amateur has been licensed continuously for 42 years, having originally been licensed in March, 1952, as W8JUV. He later held the call sign WØDMR and has held his present call sign W5PAQ since 1965. He is an Extra Class licensee, serves as a Volunteer Examiner, has served several terms as an amateur radio club officer and board member, and participated in numerous amateur radio public service programs including RACES and SkyWarn. A Life Member of the American Radio Relay League and former member of IEEE, he is the author of books and articles on communications technology, has held a commercial radiotelephone license more than 30 years and has made his career in the communication and electronics field.

The following comments, while individual in nature, are offered against this background. It is hoped that members and staff of the Commission will find them helpful and constructive.

2. SUMMARY

The Commission is to be commended for its proposal on licensee-selection of amateur call signs. In general it seems to be well-conceived and addresses most, if not all, concerns of the amateur radio community regarding the desirability of call sign selection by individual licensees and the means of implementing such a program.

Principal comments and recommendations by the undersigned can be summarized as follows:

- 1) As part of this plan, it is recommended that the Commission reinstate its policies of many years' standing prior to the mid-1970's regarding the eligibility of licensees for certain types of call signs (i.e. 1X2 call signs of the form W1AA, K1AA, etc.).

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- 2) Given the nonpecuniary nature of the amateur radio service and the nature of administrative costs associated with such licensing, it is recommended that a moderate, one-time filing and processing fee be adopted rather than any annualized or recurring fee.

3. DISCUSSION

3.1 Significance Of Call Signs To Amateurs

Radio amateurs tend to view call signs much more personally than is true of other licensees, such as the broadcast services. Amateurs are often better known in the amateur community worldwide by their calls than by their own names. Historically, an amateur's call sign has tended to reveal where the individual is from, how long he or she has been licensed and is, indirectly, a measure of stature of that individual within the amateur community. Having once obtained a desirable call sign, or having held a particular call sign for a long time, amateurs tend to be against changing it.

Call sign assignment rules and policies that recognize and, to the extent feasible, accommodate these qualities most probably will be viewed by the amateur community as fair and equitable. Therefore, they will be easier as well as more economical to administer and enforce.

In passing, the term "vanity call sign" in the NPRM seems inappropriate. The proposal fits precisely within the present call sign structure and should not be equated with programs such as those for "vanity" auto license tags.

3.2 Eligibility For 1X2 Call Signs

Prior to adopting the present call sign structure in the mid-1970's, the Commission allowed amateurs to apply for a 1X2 call sign (of the form W1AA, K1AA, etc. but not a specific choice) provided the applicant met these criteria: (a) held an Extra Class license, and (b) had been licensed for a total of at least 25 years.

This policy not only recognized the relatively small supply of such call signs but also had the beneficial effect of recognizing and rewarding both longevity and the effort required to obtain an Extra Class license. This policy was in force for many years and was well received by amateurs.

For a brief period following adoption of the present structure, Extra Class amateurs with as little as one year of service could apply for a 1X2 call sign, and large numbers of them did so. That window of opportunity was then closed, leaving out large numbers of other amateurs who may have had many years of service but did not then hold an Extra Class license.

Because of their limited supply and historical significance, it is requested that the Commission re-institute as part of the rulemaking contemplated by this NPRM its previous longevity criterion for 1X2 call signs having W and K prefixes. (Being relatively newer, the N prefix might logically be excepted from this standard, although it could also be argued that it be included for the sake of consistency.) This would result in more equitable distribution of these desirable call signs.

3.3 Fee Structure

Although the NPRM does not address fees for this service in detail, it is understood that the Commission is considering some form of annual fee or its equivalent for licensee-requested call signs. In this connection, it is requested that the Commission consider the following:

- 1) Once the administrative cost of processing an application under proposed rules has been experienced, future administration of the assigned call sign is no different than that for call signs currently assigned from the sequential pool, for which there is no charge. Therefore, the fee for assigning a requested call sign should be a one-time-only charge.
- 2) Amateur radio is required by law to be non-pecuniary in nature, and radio amateurs have a long and proud history of extensive public service done voluntarily and without compensation. Therefore, any fee imposed should be viewed as cost recovery rather than an opportunity for revenue.
- 3) In light of the above and considering the significant level of automation that exists, it is suggested that a one-time fee in the neighborhood of \$50 might be appropriate.

3.4 Determining Call Sign Availability

The NPRM requests comments on the means by which amateurs can determine the availability of specific call signs, noting that the Commission does not presently have the means to provide this information.

As noted in the NPRM, amateurs generally are a resourceful lot, and many are equipped and know how to use computer databases. Initially, this question can be left to the ingenuity of individual amateurs in confidence that they will use every means available, including call books, databases, etc. No one will want to apply for a call sign only to find that it is already assigned.

The most difficult problem is to find out what call signs have been recently assigned. This, however, is a much smaller problem than having to deal with the entire database of licensees. If the Commission has the means to extract this information electronically (could be call signs only) on a regular basis (say, monthly), it is probable that an amateur organization such as ARRL could make it available through a computer bulletin board or by other means. This would not completely eliminate applications for unavailable call signs, but should reduce the problem to relatively small proportions.

4. CONCLUSION

The amateur radio community in the U.S. has long hoped for rules providing for licensee selection of call signs, and the Commission is to be commended for its proposal and intent in this matter. It is hoped that the preceding comments have added to the discourse and that the recommendations presented here will be acted upon favorably.

Signed

